



American Association of  
State Highway and  
Transportation Officials

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David L. Winstead, President  
Secretary  
Maryland Department  
of Transportation

Francis B. Francois  
Executive Director

June 1, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RE: RM-9267

Dear Mr. Secretary:

Enclosed are an original and nine copies of AASHTO's reply comments to the Petition for Rulemaking Submitted by the Land Mobile Communications Council RM-9267 concerning the Matter of An Allocation of Spectrum for the Private Mobile Radio Services.

Do not hesitate to inform me should you have comments or questions regarding this submittal.

Very truly yours,

Francis B. Francois  
Executive Director      Communications

Enclosure

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JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
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 )  
An Allocation of Spectrum for the ) RM-9267  
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Private Mobile Radio Services )  
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Comments of the  
American Association of State Highway and Transportation Officials  
Special Committee on Communications

Chester Jones, Chairman

June 1, 1998

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
An Allocation of Spectrum for the	)	RM-9267
Private Mobile Radio Services	)	

PETITION FOR RULEMAKING  
SUBMITTED BY THE  
LAND MOBILE COMMUNICATIONS COUNCIL

TO: The Commission

INTRODUCTION

The American Association of State Highway and Transportation Officials (AASHTO) respectfully submits these comments to the Petition for Rule Making in the above captioned proceeding.

AASHTO is the national association of the state departments of highways and transportation in the 50 states, the District of Columbia and Puerto Rico. Its scope includes all five principal transportation modes, and its major purpose is to foster the development, operation and maintenance of an integrated national transportation system.

AASHTO, through its Special Committee on Communications, has been involved in matters related to radio frequency communications and associated systems for more than 40 years. AASHTO serves as the Commission's certified frequency coordinator for the Highway Maintenance Radio Service. AASHTO is an active member of the Intelligent Transportation Society of America (ITSA) with membership of many ITSA committees including the ITSA Telecommunications Committee.

AASHTO is also a member of the Land Mobile Communications Council (LMCC), and fully supports the request for a spectrum allocation described in the LMCC petition.

## POSITION STATEMENT

The petition describes the many diverse users of private radio systems and the improvement to the operation of the user organizations resulting from the communications capability provided by private mobile radio systems. AASHTO's comments will address the benefits of radio communications systems to transportation agencies.

Transportation agencies utilize wireless communications systems in the day to day operations of the departments as well as in responding to natural and man-made incidents. Benefits derived from these systems include reduced operating costs for highway construction

and maintenance. Another important benefit is the reduction in the loss of life and property associated with the aforementioned incidents resulting from instant communications capability for work crews.

State transportation agencies were licensed for VHF, 47 MHz band frequencies, in the 1950's, in accordance with the *Highway Maintenance 47 MHz National Geographic Plan*. Some of these agencies migrated to other frequency bands in order to improve certain aspects of their systems. State transportation agencies require radio communications coverage within the entire state geographic boundary.

Some transportation agencies would like to migrate to other frequency bands but cannot due to existing licensees in certain areas of their respective states. The spectrum allocation requested will alleviate that problem and provide clear spectrum for the construction of modern communications systems for those agencies desiring to modify their systems.

## CONCLUSION

AASHTO recognizes the need for additional spectrum for the multitude of private radio service users as detailed in the captioned petition. We recommend that the Commission issue a Notice of Inquiry to address the issues raised in the petition. This will allow the record in this matter to be complete and for the Commission to act with the full benefit of the input from all interested parties.

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### CONCLUSION

AASHTO recognizes the need for additional spectrum for the multitude of private radio service users as detailed in the captioned petition. We recommend that the Commission issue a Notice of Inquiry to address the issues raised in the petition. This will allow the record in this matter to be complete and for the Commission to act with the full benefit of the input from all interested parties.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Francis B. Francois".

Francis B. Francois, Executive Director  
American Association of State Highway  
and Transportation Officials